

August 10, 2016

Public Comment at the August 10, 2016 EBRPD Board Meeting

Good afternoon Board Members:

My name is Susan JunFish and I represent Parents for a Safer Environment as its Director since 2002. Our organization conducts research, education, and advocacy to help prevent disease in our community. My formal training is from UC Berkeley where I have a degree in public health, specializing in environmental health sciences. In the past 14 years, our organization has focused substantially on analyzing the pesticide use reports of municipalities based in Contra Costa County as well as providing CA Department of Pesticide Regulation approved IPM training and workshops receiving high reviews. When we analyze pesticide use reports, we share our findings and suggestions on least toxic alternatives and learn about the challenges faced by staff. Only if we are not getting resolution in a timely manner of our concerns, we will bring the issues to management and then to the Board.

Why am I before you? Two years ago, I was volunteering at a regional cross country meet of students being held at Shadow Cliff park in Pleasanton and noticed that there was dead grass underneath and around the picnic benches, along some hardscapes, base of trees and drinking fountains. I learned from staff that Surflan was applied on a routine basis for vegetation control throughout the District. It was shocking to me because the active ingredient in Surflan, oryzalin, is listed as a known human cancer-causing chemical. That day, I observed toddlers and dogs alike playing on the grounds where pesticides were applied and runners with bared skin lying down in sprayed areas. Oryzalin has an average half-life of 2 months, which means that in 2 months half of it has broken down to other chemicals, not necessarily safer either. Oryzalin is also listed as a hormone disruptor and very toxic to zooplankton, crustaceans and causes reproductive and developmental toxicity in fish. Thankfully, the District's staff has reportedly used only one other hormone disruptor, Bee Bopper, which is easily replaceable as seen in other municipalities.

Unfortunately, pesticide products are not required to identify their listed chronic toxicity on their labels, so almost no manufacturers note them since

they don't want to scare users away. One can find this data in the National Toxicology Program, USEPA, Cal/EPA, and WHO databases. So it's no wonder that staff who are so busy working with their job description to keep parks looking good usually have no idea that what they are using may impose serious harm to themselves and others upon repeated exposure even at very small amounts. We just showed the City of Walnut Creek recently that 2,4-D was found in the body of applicators at the rate of 25X higher levels after treatment in a publication. Luckily, they stopped using 2,4-D last December after having used it all these years.

I appreciate that IPM staff agreed at our meeting on April 26th to phase out the use of oryzalin, but instead of using it up in the protocol of the past, shouldn't this be used if at all, in areas where children would no longer be exposed?

I still hear the rendition of 16th century Paracelsus' adage, "Dose Makes the Poison" from those who are not aware that for decades, this conventional wisdom has been passé as researchers have published hundreds of studies in peer reviewed journals, that for some chemicals there are no safe levels. The 3 categories of chemicals for simplicity sake that should raise a red flag for avoiding whenever possible are carcinogens, reproductive or developmental toxins, and endocrine disruptors. I have brought you a lay article to provide you with more details. Even parts per trillion levels can trigger disease in human tissue culture and animal studies. These are levels that are tens of thousands of times more dilute than the levels that people can be exposed to in the parks.

Considering that the Center for Disease Control & Prevention biomonitoring program finds over a dozen pesticides on average in each of our bodies and with children sometimes carrying a burden of 200% more than adults, it is no surprise to me that the men in the Bay Area have a rate of cancer over 40% and women over 30%. Many chemicals can trigger disease, whether cancer, reproductive or developmental damage, and learning disabilities. However, the cumulative effect studies that are repeatable show that when lab animals or human tissue culture cells are exposed to multiple chemicals, synergistic and often exponential measurements of disease or frequency are observed. 100% of studies required to be done by the manufacturers before pesticides are approved for the market are done with exposure to animals or tissue culture cells with just that one product alone with no other chemicals

or stressors like the way we are bombarded by multiple stressors that include other chemicals, hormone disruptors that potentiate many chemicals, UV radiation, stress, microbial infections like a cold or other parasitic attacks that lower our immune system and make us more susceptible to disease.

Subsequently, I asked your staff for pesticide use reports in FY 13 and 14 and worked with our college Interns to analyze the data that I am submitting to you as part of the meeting minutes. I must express the concern that I was advised contractors treatments are not all tracked. I hope that this oversight can be corrected soon. Any sound IPM program tracks ALL pesticide usage in order to assess effectiveness of an implemented program and tracking of pest populations in response to abatement strategies is a key component of a sensible IPM program. Please support your IPM staff so that all programs that hire contractors are required to submit data to staff in order to provide transparency, accountability, and collaboration with stakeholders.

In Summary, I ask that you provide Parents for a Safer Environment an opportunity to explain our findings and share with you what we have learned about EBRPD's IPM program and our recommendations for the highest priorities for improvement. Please consider providing me with 1 hour for a future presentation to share with you our findings on what pesticides you are using that is in contrast with municipalities like Marin County who do not use rodenticides like diphacinone in open space and Santa Clara County who do not use herbicides in landscaped park areas when people and pets can be exposed. I will need time to explain how these municipalities are succeeding without the conventional risky methods.

You may assume that trapping is too expensive, that goat grazing along banks of streams causes contamination in downstream tributaries, and that herbicides are safer than insecticides. My findings may provide you with pleasant surprises.

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